

UNITED STATES BANKRUPTCY COURT FOR  
THE WESTERN DISTRICT OF OKLAHOMA

IN RE: JOHN H. WILLIAMS, JR.  
DEANNA L. WILLIAMS

Debtors.

Bk. Case No. 15-13717 JDL  
CHAPTER 13

OBJECTION TO CONFIRMATION OF PLAN

U.S. Bank N.A., as Trustee for the registered holders of the Structured Asset Securities Corporation, Structured Asset Investment Loan Trust, Mortgage Pass-Through Certificates, Series 2003-BC9, hereinafter referred to as "Movant", holding a secured claim against the above named Debtors, hereby objects to Confirmation of the Debtors' proposed Plan on the following grounds:

Movant holds a secured claim secured by a first mortgage on the property described as follows, to wit:

LOT TWENTY (20), IN A RE-SUBDIVISION OF A PART OF FOREST PARK ADDITION, TO OKLAHOMA CITY, OKLAHOMA COUNTY, OKLAHOMA, AS SHOWN BY THE RECORDED PLAT THEREOF.

PROPERTY ADDRESS: 3204 N. Bryant, Oklahoma City, OK 73121

Debtors' Plan provides for a cramdown on debt owed to Movant to \$82,076.00, and provides for a monthly payment of \$1,184.00. While Movant does not object to the value, Movant would object to this payment amount as this secured debt would not be paid off within the 60 months of the plan at this payment amount, as required pursuant to 11 U.S.C § 1325(a)(5)(b)(ii).

In accordance with the Fair Debt Collection Practices Act, unless the consumer, within thirty days after receipt of this notice, disputes the validity of any portion of the debt, the debt will be assumed valid. If said consumer notifies the undersigned attorney for Plaintiff in writing

within said thirty day period that any portion of the debt is disputed, said attorney will obtain verification of the debt and/or judgment and a copy of such verification will be mailed to said consumer by the undersigned attorney for Plaintiff; and upon written request by the consumer within the thirty day period, the undersigned attorney for Plaintiff will provide the name and address of the original creditor, if different from the current creditor. This is an attempt to collect a debt and any information obtained will be used for that purpose.

The confirmation hearing is scheduled for November 5, 2015 at 11/05/2015.

WHEREFORE, U.S. Bank N.A., as Trustee for the registered holders of the Structured Asset Securities Corporation, Structured Asset Investment Loan Trust, Mortgage Pass-Through Certificates, Series 2003-BC9, secured creditor herein, objects to Confirmation of the Plan as proposed by the Debtors herein, and prays the same be modified so as to comply with the requirements of Chapter 13 of Title 11 of the United States Code, and, for such other relief as the Court may deem proper.

SHAPIRO & CEJDA, LLC

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CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 28<sup>th</sup> of October, 2015, the foregoing pleading was mailed via U.S. Mail, first class, postage prepaid to the following parties, to-wit: John H. Williams, Jr. and Deanna L. Williams, 3320 Norcrest Drive, Oklahoma City, OK 73121, (Debtors). Further, I certify that a true and correct copy of the foregoing pleading was electronically served on the 28<sup>th</sup> of October, 2015, using the CM/ECF system to the following parties: Gabriel Rivera, (Attorney for Debtors), John T. Hardeman, (Trustee).

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s/Kirk J. Cejda  
Kirk J. Cejda #12241

File No. 12-112693